

## Mojave Desert Air Quality Management District

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Visit our web site: http://www.mdaqmd.ca.gov Brad Poiriez, Executive Director

May 23, 2018

Carol Sutkus State of California Environmental Protection Agency Air Resources Board P. O. Box 2815 Sacramento, California 95812

Project Title: Adoption of MDAQMD Federal Negative Declarations for Two Control Techniques Guidelines Source Categories

Dear Ms. Sutkus:

The Mojave Desert Air Quality Management District (MDAQMD) requests that the California Air Resources Board submit the MDAQMD *Federal Negative Declarations for Two Control Techniques Guidelines Source Categories* to the United States Environmental Protection Agency (USEPA) for inclusion in the State Implementation Plan (SIP).

The adoption of the *FNDs for Two CTG Source Categories* is necessary because for those source categories not represented within the area designated non-attainment for ozone, and covered by a Control Techniques Guidelines (CTG) or which meet the definition of a major source, USEPA requires the submission of a Federal Negative Declaration (FND) certifying that those sources are not present. In the process of updating Rule 1115 – *Metal Parts & Products Coating Operations* to meet Reasonably Available Control Technology (RACT) requirements, the MDAQMD discovered that two CTG source categories in the *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008) were not adequately covered in the MDAQMD rule book. The MDAQMD then examined its permit files, emissions inventory and other documentation and has determined that there are no sources for Plastic Parts and Products, and Automotive/Transportation and Business Machine Plastic Parts, located within the jurisdiction of the MDAQMD and none are anticipated in the near future

If you have any questions regarding this submittal, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122. Please note that all documents required for a complete submission were sent electronically on May 23, 2018.

Sincerely

Alan J. De Salvio

Deputy Director - Mojave Desert Operations

AJD/tw

CARB SIP Submittal Request 2018 FND 2 Source Categories